

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

RYAN KING

CASE NO.

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES,
LLC, EXPERIAN INFORMATION
SOLUTIONS, INC., and TRANS UNION, LLC,

**TRANS UNION, LLC'S
NOTICE OF REMOVAL**

Defendants.

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“TransUnion”) hereby removes the subject action from the Supreme Court of the State of New York, County of Kings to the United States District Court for the Eastern District of New York on the following grounds:

1. Plaintiff Ryan King (“King”) is a natural person who resides in New York.
2. Defendant TransUnion is a Delaware corporation with its principal place of business in Illinois.

NATURE OF CASE

3. On January 2, 2025, King commenced this action in the Supreme Court of the State of New York, County of Kings, entitled *Ryan King v. Equifax Information Services, LLC, et al.*, Index Number 50054/2025 via a Summons with Notice. A true and correct copy of the Summons with Notice is attached hereto as **Exhibit A**.

4. On January 2, 2025, King served TransUnion with a Summons with Notice filed in Supreme Court of the State of New York, County of Kings, Index Number 50054/2025. *See* Ex.

A. No other process, pleadings, or orders have been served on TransUnion.

5. King makes claims under and alleges that TransUnion violated the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”) and General Business Law, 15 U.S.C. § 380-j(e) et seq. (the “GBL”). *See* Ex. A.

6. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

7. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Supreme Court of the State of New York, County of Kings, to the United States District Court for the Eastern District of New York.

8. Removal is timely under 28 U.S.C. § 1446 because this Notice of Removal is filed within 30 days after TransUnion’s receipt of a copy of the Summons with Notice, filed in the Supreme Court of the State of New York, County of Kings.

9. Attached hereto as **Exhibit B** is a copy of TransUnion’s Notice of Filing Notice of Removal to be filed in the Supreme Court of the State of New York, County of Kings, Number 50054/2025.

10. Counsel for Equifax Information Services, LLC and Experian Information Solutions, Inc. have consented to removal. Attached hereto as **Exhibit C** is a copy of the consent forms.

11. Notice of this Removal will promptly be filed with the Supreme Court of the State of New York, County of Kings and served upon all parties.

WHEREFORE, Defendant TransUnion, by counsel, removes the subject action from the Supreme Court of the State of New York, County of Kings to this United States District Court, Eastern District of New York.

Date: January 31, 2025

BUCHANAN INGERSOLL & ROONEY PC

/s/ Andrew G. Hope

Andrew G. Hope (NY Bar ID No. 4913547)

Makenzie P. Leh, Esq. (*Pro Hac* Admission
Forthcoming)

640 5th Avenue, 9th Floor

New York, New York 10019-6102

215 665 5322 (o)

Andrew.hope@bipc.com

Counsel for Trans Union, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of December 2024, I caused a copy of the foregoing Notice of Removal to be electronically filed with the Clerk via CM/ECF. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing systems and via United States First Class Mail. Parties may access the filing through the Court's CM/ECF System.

Dated: January 31, 2025

/s/ Andrew G. Hope
Andrew G. Hope

EXHIBIT A

FILED: KINGS COUNTY CLERK 01/02/2025 01:58 PM

INDEX NO. 500054/2025

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 01/02/2025

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

RYAN KING,

*Plaintiff,**-against-*EQUIFAX INFORMATION SERVICES, LLC,
EXPERIAN INFORMATION SOLUTIONS,
INC., and TRANS UNION, LLC,*Defendants.***SUMMONS WITH NOTICE**

To the Entities Named as Defendants Above:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to appear in this action by serving notice of appearance on the Plaintiff at the address of Plaintiff's counsel, via the NYSCEF system, within 20 days after the service of this Summons (not counting the day of service itself), or within 30 days after service is complete if the summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT should you fail to answer or appear, a judgment will be entered against you by default for the relief demanded below.

Dated: January 2, 2025
New York, NY

/s/ Adam G. Singer

Adam G. Singer
LAW OFFICE OF ADAM G. SINGER, PLLC
One Grand Central Place
60 E. 42nd Street, Suite 4600
New York, NY 10165
212.842.2428
asinger@adamsingerlaw.com

*Counsel for Plaintiff Ryan King***Defendants' Addresses:**

Equifax Information Services, LLC, 1550 Peachtree Street, N.W., Atlanta, Georgia 30309
Experian Information Solutions, Inc., 475 Anton Boulevard, Costa Mesa, CA 92626
Trans Union, LLC, 555 W. Adams St., Chicago, IL 60661

FILED: KINGS COUNTY CLERK 01/02/2025 01:58 PM

INDEX NO. 500054/2025

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 01/02/2025

Notice: The nature of this action is:

Defendants Experian Information Solutions, Inc., Equifax Information Services, LLC, and Trans Union LLC, (together, the "CRA Defendants") violated the law including the following provisions:

- 15 U.S.C. § 1681c-2 relating to identity theft
- 15 U.S.C. § 1681e (b)
- 15 U.S.C. § 1681i
- General Business Law § 380-f
- General Business Law § 380-j

Those violations include the following conduct by one or more of the CRA Defendants:

- maintaining in and reporting from the credit file they maintained about Plaintiff information they had reason to know was inaccurate;
- failing to maintain reasonable procedures to assure the maximum possible accuracy of information they reported about Plaintiff;
- failing to conduct reasonable investigations after Plaintiff disputed certain information in credit reports they published about him;
- failing to promptly delete disputed information from credit files they maintained about Plaintiff despite the fact that, had they conducted reasonable investigations of Plaintiff's disputes, they could not have affirmatively verified that the disputed information was accurate; and
- failing to block the reporting of information in Plaintiff's file that Plaintiff identified as having resulted from identity theft.

As a consequence of the CRA Defendants' violations, Plaintiff has suffered pecuniary and non-pecuniary harm.

The relief sought is:

- Actual damages for both economic and emotional harm in an amount exceeding \$25,000 and to be determined by the trier of fact,
- \$1,000 in statutory damages per violation,
- punitive damages in an amount to be determined by the trier of fact,
- injunctive relief against reporting or continuing to report the inaccurate information,
- litigation costs and expenses, and
- reasonable attorney's fees.

Should the CRA Defendants fail to appear herein, judgment will be entered by default for the sum of \$3,000,000.00, with interest to run from January 2, 2025.

Jury Trial: Plaintiff demands a jury trial on all issues so triable.

Venue: Plaintiff designates Kings County as the place of trial. The basis of this designation is that Plaintiff resides in Kings County at 1091 Gates Avenue, Apartment 2E, Brooklyn, NY 11221.

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

-----X
RYAN KING,

Plaintiff,

-against-

EQUIFAX INFORMATION SERVICES, LLC,
EXPERIAN INFORMATION SOLUTIONS,
INC., and TRANS UNION, LLC,

Index No. 500054/2025

Defendant.
-----X

**NOTICE OF ELECTRONIC FILING
(Mandatory Case)
(Uniform Rule § 202.5-bb)**

You have received this Notice because:

- 1) The Plaintiff/Petitioner, whose name is listed above, has filed this case using the New York State Courts E-filing system ("NYSCEF"), and
- 2) You are a Defendant/Respondent (a party) in this case.

● **If you are represented by an attorney:**

Give this Notice to your attorney. (Attorneys: see "Information for Attorneys" pg. 2).

● **If you are not represented by an attorney:**

You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.

If you choose to participate in e-filing, you must have access to a computer and a scanner or other device to convert documents into electronic format, a connection to the internet, and an e-mail address to receive service of documents.

The benefits of participating in e-filing include:

- serving and filing your documents electronically
- free access to view and print your e-filed documents
- limiting your number of trips to the courthouse
- paying any court fees on-line (credit card needed)

To register for e-filing or for more information about how e-filing works:

- visit: www.nycourts.gov/efile-unrepresented or
- contact the Clerk's Office or Help Center at the court where the case was filed. Court contact information can be found at www.nycourts.gov

To find legal information to help you represent yourself visit www.nycourthelp.gov

**Information for Attorneys
(E-filing is Mandatory for Attorneys)**

An attorney representing a party who is served with this notice must either:

- 1) immediately record his or her representation within the e-filed matter on the NYSCEF site www.nycourts.gov/efile ; or
- 2) file the Notice of Opt-Out form with the clerk of the court where this action is pending and serve on all parties. Exemptions from mandatory e-filing are limited to attorneys who certify in good faith that they lack the computer hardware and/or scanner and/or internet connection or that they lack (along with all employees subject to their direction) the knowledge to operate such equipment. [Section 202.5-bb(e)]

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at www.nycourts.gov/efile or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: nyscef@nycourts.gov).

Dated: January 2, 2025

Name
Adam G. Singer

Firm Name
Law Office of Adam G. Singer, PLLC

Address
One Grand Central Place
60 E. 42nd Street, Suite 4600
New York, NY 10165

Phone
212.842.2428

E-Mail
documents@adamsingerlaw.com

To: Trans Union, LLC,
555 W. Adams Street
Chicago, IL 60661

EXHIBIT B

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

RYAN KING, Plaintiff, vs. EQUIFAX INFORMATION SERVICES, LLC, EXPERIAN INFORMATION SOLUTIONS, INC., and TRANS UNION, LLC, Defendants.	Index No. 50054/2025
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**NOTICE OF FILING NOTICE OF REMOVAL
WITH THE UNITED STATES DISTRICT COURT**

Please take notice that Defendant Trans Union, LLC has filed the attached Notice of Removal with the Clerk of the United States District Court for the Eastern District of New York on January 31, 2025. A true and correct copy of the Notice of Removal filed with the United States District Court Eastern District of New York is attached hereto as **Exhibit A**.

Date: January 31, 2025

BUCHANAN INGERSOLL & ROONEY PC

/s/ Andrew G. Hope
Andrew G. Hope (NY Bar ID No. 4913547)
640 5th Avenue, 9th Floor
New York, New York 10019-6102
215 665 5322 (o)
Andrew.hope@bipc.com

Counsel for Trans Union, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of January 2025, I caused a copy of the foregoing Notice of Filing Notice of Removal to be electronically filed with the Clerk via CM/ECF. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing systems and via United States First Class Mail. Parties may access the filing through the Court's CM/ECF System.

Dated: January 31, 2025

/s/ Andrew G. Hope
Andrew G. Hope

EXHIBIT C

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

RYAN KING

CASE NO.

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES,
LLC, EXPERIAN INFORMATION
SOLUTIONS, INC. and TRANS UNION,
LLC,

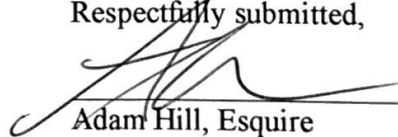
Defendants.

DEFENDANT EQUIFAX'S CONSENT TO REMOVAL

Without waiving any of its defenses or other rights, Defendant Equifax Information Services, LLC, hereby acknowledges its consent to the removal of this action from the Supreme Court of the State of New York, County of Kings to the Eastern District of New York.

Date:

Respectfully submitted,



Adam Hill, Esquire
Seyfarth Shaw LLP
233 S. Wacker Drive, Suite 8000
Chicago, Illinois 60606-6448
ahill@seyfarth.com

*Counsel for Defendant, Equifax Information
Services, LLC.*

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

RYAN KING

CASE NO.

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES,
LLC, EXPERIAN INFORMATION
SOLUTIONS, INC. and TRANS UNION,
LLC,

Defendants.

DEFENDANT EXPERIAN'S CONSENT TO REMOVAL

Without waiving any of its defenses or other rights, Defendant Experian Information Solutions, Inc., hereby acknowledges its consent to the removal of this action from the Supreme Court of the State of New York, County of Kings to the Eastern District of New York.

Date: 01/24/2025

Respectfully submitted,

Kim Purcell

Kim A. Purcell, Esquire
Kim.purcell@experian.com

*Representative for Defendant, Experian
Information Solutions, Inc.*